1		Honorable John H. Chun				
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8						
9	UNITED STATES I WESTERN DISTRICT					
10	AT TAC					
11	HANNA J. McANDIE,	No. 3:21-cv-05227-JHC				
12 13	Plaintiff,	PRETRIAL ORDER				
13	VS.					
15	ROBERT CLARK,	TRIAL DATE: MARCH 27, 2023				
16	, and the second	,				
17	Defendant.					
18	I. INTRO	ODUCTION				
19		nce, the sole remaining defendant is Robert				
20	Clark, in his individual capacity. With McAndi					
21	that it intends to offer the same witnesse					
22	have been identified by Defendant Sequim Scho	pol District (SSD).				
23	II. JUR	ISDICTION				
24	The parties dispute that jurisdiction is pr	oper with this Court.				
25	II. CLAIMS A	AND DEFENSES				
26	A. Plaintiff's Claims					
27	Plaintiff brings the following claims aga	inst Defendant Robert Clark:				
	PRETRIAL ORDER - 1					
	No. 3:21-cv-05227-JHC					

- 1. Sexual harassment/discrimination under RCW 49.60.180(3), specifically, hostile work environment.
- 2. Retaliation under RCW 49.60.210(1) related to Defendant Clark's investigations into an allegation of an affair between Plaintiff and prior Superintendent Gary Neal.

B. Defendant Clark's Defenses:

- 1. Plaintiff has failed to state a claim for which relief can be granted.
- 2. Damages, if any, sustained by the Plaintiff were proximately caused by persons other than Clark and Clark has no legal liability, either direct or vicarious.
- Damages, if any, sustained by Plaintiff were not the result of the action by Clark and
 must be segregated from those sustained as a result of intentional or unlawful
 conduct by others.
- 4. Plaintiff has failed to mitigate damages.
- 5. Damages, in whole or in part, are due to conditions that preexisted or are unrelated to the claims alleged against Clark in Plaintiff's Complaint.
- 6. Plaintiff's Complaint, and each of its causes of action, is barred, because Clark's actions with respect to Plaintiff were take solely for legitimate, non-discriminatory, non-retaliatory, and non-pretextual reasons unrelated to any alleged protected activity by Plaintiff or any alleged discrimination, harassment or retaliation.
- 7. Pursuant to the laws of the State of Washington, including RCW 4.22.070, Clark is entitled to an allocation of fault under the determination of proportionate share of entities/individuals causing damages if recovery is sought.
- 8. There is no causation between the acts alleged against Clark and the damages claimed to have been sustained by Plaintiff.

III. ADMITTED FACTS 1 The following facts are admitted by the parties: 2 3 1. Defendant SSD employed Plaintiff starting in October 2017 as a part-time substitute 4 para educator. She became a permanent special education para in November 2017. 5 2. Plaintiff married Ian McAndie in 2018. 6 3. During the time period relevant to this case, Plaintiff was working full-time with 7 SSD, most recently as a Student Support Specialist. 8 4. On May 9, 2019, Plaintiff filed an incident report alleging middle school principal, 9 Vince Riccobene, was belligerent and intimidating to her and mocked/belittled a 10 special education student in a discriminatory manner during a community truancy 11 board meeting. 12 5. The District retained a third-party investigator who concluded that Mr. Riccobene 13 engaged in the alleged behavior. 14 6. Superintendent Gary Neal resigned and Defendant Clark became superintendent in 15 July 2019. 16 7. After Neal resigned and Defendant Clark became the new superintendent, Clark 17 became aware of an allegation that Plaintiff and Neal were having an affair when 18 Neal was the Superintendent. 19 8. Defendant Clark investigated the allegation. 20 21 9. As part of that investigation, Defendant Clark approached Plaintiff's father-in-law, 22 John McAndie, who worked as the Director of Maintenance for SSD, and asked him 23 about the allegation. 24 10. John McAndie told Defendant Clark that he had no knowledge of such a 25 relationship. 26 11. The conversation took place in John McAndie's office. 27

- 12. On October 9, 2020, Plaintiff reported to the District that she experienced sexual harassment and discrimination as a result of Defendant Clark's actions.
- 13. Plaintiff started working remotely in June 2020, until she took leave around February 2021.
- 14. After the District began an investigation based on Plaintiff's complaints of sexual harassment and discrimination, Defendant Clark resigned.
- 15. The District concluded that Defendant Clark "used poor judgment in the way he approached the situation, causing embarrassment and discomfort."
- 16. Plaintiff's husband filed for divorce in December 2021.

III. ISSUES OF LAW

- 1. Was Plaintiff subjected to unwelcome verbal and physical conduct that was sufficiently severe or pervasive to alter conditions of employment and create a subjective and objective abusive work environment because of sex?
- 2. Did Defendant Clark investigate the allegation about Plaintiff having an affair with a prior superintendent in retaliation for Plaintiff's Complaint filed against Vince Riccobene?
- 3. Was retaliation the substantial factor motivating Defendant Clark to investigate the allegation about Plaintiff having an affair with a prior superintendent?
- 4. Would Defendant Clark's investigations into the allegation about Plaintiff having an affair with the prior superintendent dissuade a reasonable person in Plaintiff's position from reporting harassment and/or discrimination?

DESIGNATION OF DEPOSITION AND OBJECTIONS THERETO

The parties have not designated any deposition testimony for use at trial.

DAMAGES AND OTHER RELIEF REQUESTED

Plaintiff seeks economic damages, both in the form of lost past income and benefits and lost future income and benefits, and noneconomic damages (pain and suffering).

SETTLEMENT

The parties attempted a mediation before Paris Kallas on November 3, 2022. The mediation was unsuccessful. Subsequently, Plaintiff has settled with SSD but the claims against Clark go forward.

EXPERT WTINESSES

- (a) Each party shall be limited to 1 expert witness on the issue of Plaintiff's medical condition.
- (b) The names and addresses of the expert witnesses to be used by each party at the trial and the issue upon which each will testify is:
 - (1) On behalf of Plaintiff:
 - a. Dr. Laura Brown, 4131 1st Ave NW, Seattle WA 98107-4910. Dr. Brown will testify regarding her evaluation of Plaintiff's mental state.
 - (2) On behalf of Defendant:
 - a. Dr. Kathryn Applegate, 2105 North 30th Street, Tacoma, WA 98403. Dr.
 Applegate will testify regarding her evaluation of Plaintiff's mental state.

WITNESSES

A. Plaintiff's Witnesses

	Name	Address	Expected Testimony	Likelihood of Testifying
1.	Hanna McAndie Plaintiff	c/o Plaintiff's counsel	Ms. McAndie will testify regarding her knowledge of facts supporting claims, damages, and refuting the defenses raised in this case.	Will Testify
2.	May Smith Plaintiff's mother	c/o Plaintiff's counsel.	Ms. Smith will testify regarding her knowledge of Plaintiff before, during, and after her employment with SSD.	Will Testify

3.	Jim Stoffer	SSD Director	Mr. Stoffer was a SSD	Will Testify
		Adverse	school board member	
		Witness	during times relevant to the	
			issues described in the	
			Amended Complaint. He	
			will testify regarding facts	
			pertaining to the claims,	
			defenses and damages in	
			this case.	
4.	Valorie Knieper	SSD	Ms. Knieper was an SSD	Will Testify
		Employee	employee during the period	
			relevant to the issues	
			described in the Amended	
			Complaint. She will testify	
			regarding facts pertaining	
			to claims, defenses and	
			damages to this case.	
5.	Anita Benitez	SSD	Ms. Benitez may testify	May Testify
		Employee	regarding her knowledge	
			of facts pertaining to the	
			claims, defenses and	
		2004 ***	damages in this case.	******* FDC
6.	Gary Neal	2004 W	Mr. Neal was SSD	Will Testify
		Courtland Ave	Superintendent and will	
		Spokane, WA	testify regarding facts	
		99205	pertaining to the claims,	
			defenses and damages in	
7.	Isanifan Maughan	PO Box 16332	this case.	Will Tootife
1.	Jennifer Maughan		Ms. Maughan was SSD Assistant Superintendent	Will Testify
		Seattle, WA 98116	and will testify regarding	
		90110	facts pertaining to the	
			claims, defenses and	
			damages in this case.	
8.	Linsay Rapelje	SSD	Ms. Rapelje is a librarian at	May Testify
о.	Linsay Kaperje	Employee	Sequim School District and	Iviay 1 com
		Limployee	and mill testify regarding	
			facts pertaining to the	
			claims, defenses and	
			damages in this case.	
9.	Matt Piersoll	919 S Pine St	Mr. Piersoll is a Border	May Testify
٠.	Witte Tierson	Port Angeles,	Patrol Agent and	Way Testin
		WA 98362	FaceBook blogger who	

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			may testify regarding facts pertaining to the claims, defenses and damages in this case.	
10.	Larry Hill	32 Plum Tree LN Sequim, WA 98382	Mr. Hill is a retired Sequim School District teacher and may testify regarding facts pertaining to the claims, defenses and damages in this case.	May testify
11.	Dena Riccobene	2001 Bluebell Dr Lynden, WA 98264	Ms. Riccobene was a SSD employee and will testify regarding facts pertaining to the claims, defenses and damages in this case.	May testify
12.	Elizabeth Lawson	SSD Employee	Ms. Lawson is an SSD employee and may testify regarding facts pertaining to the claims, defenses and damages in this case.	Will Testify
13.	John McAndie	SSD Employee	Mr. McAndie is an SSD employee and will testify regarding facts pertaining to the claims, defenses and damages in this case.	Will Testify
14.	Robert Clark	Defendant	Mr. Clark is a former SSD employee and may testify regarding facts pertaining to the claims, defenses and damages in this case.	May Testify
15.	Amy Klosterman	P.O. Box 17130 Seattle, WA 98127	Ms. Klosterman is a lawyer who investigated aspects of Plaintiff's claims and will testify regarding facts pertaining to the claims, defenses and damages in this case.	Will Testify
16.	David Lyke	SSD Volunteer	SSD Volunteer and contracted staff member - will testify regarding facts pertaining to the claims, defenses and damages in this case.	May Testify
17.	Justina Grimes Brown	Cape Flattery Staff	Observing training CTB	May Testify

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18.	Megan Lyke	SSD	Ms. Lyke may testify	May Testify
		Employee	regarding facts pertaining	
			to the claims, defenses and	
			damages in this case.	
10	1 00	aab	M 1 CC '11 / / C	W.11 DC
19.	Larry Jeffryes	SSD Volunteer	Mr. Jeffryes will testify regarding facts pertaining	Will Testify
		Volunteer	to the claims, defenses and	
			damages in this case.	
20.	Diana Piersoll	SSD employee	SSD Employee will testify	Will Testify
			regarding facts pertaining	
			to the claims, defenses and	
			damages in this case.	
21.	Brandino Gibson	SSD SB	Mr. Gibson will testify	Will Testify
			regarding facts pertaining	
			to the claims, defenses and	
22.	Brian Kuh	SSD SB	damages in this case. Mr. Kuh may testify	May Testify
<i>LL</i> .	Difaii Kuii	330 30	regarding facts pertaining	Way resury
			to the claims, defenses and	
			damages in this case.	
23.	Heather Short	SSD SB	Ms. Short may testify	May Testify
			regarding facts pertaining	
			to the claims, defenses and	
		665 775	damages in this case.	2.5 = 10
24.	Randy Hill	SSD HR	Mr. Hill may testify	May Testify
		Director (former)	regarding facts pertaining to the claims, defenses and	
		(IOIIIICI)	damages in this case.	
25.	Robin Henricksen	SSD SB	Ms. Henricksen may testify	May Testify
			regarding facts pertaining	
			to the claims, defenses and	
			damages in this case.	
26.	Vince Riccobene	SSD Middle	Mr. Riccobene may testify	May Testify
		School	regarding facts pertaining	
		Principal (former)	to the claims, defenses and	
27.	Trayce Norman	SSD employee	damages in this case. Ms. Trayce may testify	
<i>-</i> / .	Trayec Horman	555 chiployee	regarding facts pertaining	
			to the claims, defenses and	
			damages in this case.	
28.	Victoria Balint	SSD HR	Ms. Balint will testify	Will Testify
		Director	regarding facts pertaining	
			to the claims, defenses and	
			damages in this case.	

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29.	Darlene Apeland	SSD employee	Ms. Apeland may testify regarding facts pertaining to the claims, defenses and damages in this case.	May Testify
30.	Jane Pryne	SSD Superintendent	Ms. Prine may testify regarding facts pertaining to the claims, defenses and damages in this case.	May Testify
31.	Shawn Flood	SSD Investigator	Ms. Flood will testify regarding her investigation of the claims, defenses and damages in this case.	Will Testify

B. Defendants' Witnesses

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Identification Status Will testify 1. Hanna McAndie c/o Dan Gallagher Gallagher Law Office PS 10611 Battler Point Drive NE Bainbridge, WA 98110-1493 Hanna McAndie is the plaintiff in this case and will testify regarding her knowledge of facts pertaining to the claims, defenses and damages at issue in this lawsuit. 2. Robert Clark Will testify c/o Lori Bemis McGavick Graves 1102 Broadway Ste 500 Tacoma, WA 98402 Robert Clark was the Superintendent at Sequim School District at times relevant to the issues described in the Complaint. He will testify regarding the facts pertaining to the claims, defenses and damages in this lawsuit.

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3.	John McAndie	Will testify
	c/o Preg O'Donnell and Gillett	
	901 Fifth Avenue, Suite 3400	
	Seattle, Washington 98164	
	John McAndie was the Director of Maintenance at Sequim School	
	District at all times relevant to the issues described in the Complaint. He	
	will testify regarding the facts pertaining to the claims, defenses and	
	damages in this lawsuit.	
4.	Valorie Knieper c/o Preg O'Donnell and Gillett	Will testify
	901 Fifth Avenue, Suite 3400	
	Seattle, Washington 98164	
	Volonia Unianan was a Human Dasaynass Smarialist at Sagyim Sahaal	
	Valorie Knieper was a Human Resources Specialist at Sequim School District at all times relevant to the issues described in the Complaint. She	
	will testify regarding the facts pertaining to the claims, defenses and	
5.	damages in this lawsuit.	Will tootify
3.	Darlene Apeland c/o Preg O'Donnell and Gillett	Will testify
	901 Fifth Avenue, Suite 3400	
	Seattle, Washington 98164	
	Darlene Apeland was the Director of Business Operations and Finances	
	at Sequim School District at all times relevant to the issues described in	
	the Complaint. She will testify regarding the facts pertaining to the	
	claims, defenses and damages in this lawsuit.	
6.	Brandino Gibson	Will testify
	11 Mustang Ln, Ste 104	J
	Sequim, WA 98382	
	Brandino Gibson was President of the Sequim School District School	
	Board at all times relevant to the issues described in the Complaint. He	
	will testify regarding the facts pertaining to the claims, defenses and	
	damages in this lawsuit.	

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7.	Megan Lyke	Will testify
, •	c/o Preg O'Donnell and Gillett	will testify
	901 Fifth Avenue, Suite 3400	
	Seattle, Washington 98164	
	Megan Lyke was Public Information Officer at Sequim School District	
	during times relevant to the issues described in the Complaint. She will	
	testify regarding the facts pertaining to the claims, defenses and	
	damages in this lawsuit.	
8.	Tricia Stratton	Will testify
·.	c/o Preg O'Donnell and Gillett	will testify
	901 Fifth Avenue, Suite 3400	
	Seattle, Washington 98164	
	Tricia Stratton was Office Coordinator for Greywolf Elementary at	
	Sequim School District during times relevant to the issues described in	
	the Complaint. She will testify regarding facts pertaining to the claims,	
	defenses and damages in this lawsuit.	
9.	Erin Fox	Will testify
	c/o Preg O'Donnell and Gillett	
	901 Fifth Avenue, Suite 3400	
	Seattle, Washington 98164	
	Erin Fox is High School Principal at Sequim School District and was an	
	Assistant Principal during times relevant to the issues described in the Complaint. She will testify regarding facts pertaining to the claims,	
	defenses and damages in this lawsuit.	
1.0		******
10.	Trayce Norman	Will testify
	c/o Preg O'Donnell and Gillett	
	901 Fifth Avenue, Suite 3400	
	Seattle, Washington 98164	
	Trayce Norman was the Executive Assistant to the Superintendent at	
	Sequim School District during all times relevant to the issues described	
	in the Complaint. She will testify regarding facts pertaining to the claims,	
	defenses and damages in this lawsuit.	
	arrange and damages in any lambara	
11.	Dr. Kathryn Applegate	Will Testify
•	2105 North 30 th Street	
	Tacoma, WA 98403	
	Dr. Applegate is expected to testify regarding the mental health of	
	Plaintiff as it relates to the issues described in the Complaint and	
	regarding the claims, defenses and damages in this lawsuit.	

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1	12.	Gary Neal	Will Testify
1		2004 W Courtland Ave Spokane, WA 99205	
2		Spokule, WI 77205	
3		Gary Neal was Superintendent at Sequim School District during times	
4		relevant to the issues described in the Complaint. She will testify regarding facts pertaining to the claims, defenses and damages in this	
5		lawsuit.	
	13.	Ian McAndie c/o Derek Medina, Attorney	Will Testify
6		210 E 5 th St.	
7		Port Angeles, WA 98362	
8		Ian McAndie was married to Hanna McAndie during times relevant to	
9		the issues described in the Complaint. He will testify regarding facts pertaining to the claims, defenses and damages in this lawsuit.	
10			
11	14.	Jennifer Maughan 1708 45 th Avenue SW	Will Testify
12		Seattle, WA 98116	
		Laurifen Meuchen was Assistant Sunsvintandent at Sessim School	
13		Jennifer Maughan was Assistant Superintendent at Sequim School District during times relevant to the issues described in the Complaint.	
14		She will testify regarding facts pertaining to the claims, defenses and	
15	15.	damages in this lawsuit.	Will Tostify
16	13.	Kathleen Haggard Haggard & Ganson LLP	Will Testify
		19125 North Creek Parkway, Suite 120 PMB 337	
17		Bothell, Washington 98011	
18		Kathleen Haggard conducted an investigation into whether Plaintiff was	
19		retaliated against by Sequim School District for submitting a complaint of sexual harassment against former Superintendent Rob Clark. She will	
20		testify regarding facts pertaining to claims, defenses and damages to this	
21		lawsuit.	
	16.	Linsay Rapelje	Will Testify
22		c/o Preg O'Donnell and Gillett 901 Fifth Avenue, Suite 3400	
23		Seattle, Washington 98164	
24		Lineary Danalia is a librarian at Cassim Cabaal District and	
25		Linsay Rapelje is a librarian at Sequim School District and was an Assistant Principal during times relevant to the issues described in the	
26		Complaint. She will testify regarding facts pertaining to the claims,	
		defenses and damages in this lawsuit.	
27			

17.	Matt Piersoll	Will Testify
	919 S Pine St	
	Port Angeles, WA 98362	
	Matt Piersoll is a member of the Sequim community at all times relevant	
	to the issues described in the Complaint. He will testify regarding facts	
	pertaining to the claims, defenses and damages in this lawsuit.	
18.	Vince Riccobene	Will Testify
	2001 Bluebell Dr	
	Lynden, WA 98264	
	Vince Riccobene was a school principal in Sequim school District at all	
	times relevant to the issues described in the Complaint. He will testify	
	regarding facts pertaining to the claims, defenses and damages in this lawsuit.	
19.	Victoria Balint	May Testify
	c/o Preg O'Donnell and Gillett	
	901 Fifth Avenue, Suite 3400 Seattle, Washington 98164	
	Seattle, Washington 70104	
	Victoria Balint was Director of Human Resources during times relevant	
	to the issues described in the Complaint. She will testify regarding facts pertaining to the claims, defenses and damages in this lawsuit.	
	pertuning to the claims, detended and damages in this lawbuilt.	
20.	Rebecca Stanton	May Testify
	c/o Preg O'Donnell and Gillett 901 Fifth Avenue, Suite 3400	
	Seattle, Washington 98164	
	Rebecca Stanton was an elementary school Principal for Sequim School	
	District during times relevant to the issues described in the Complaint. She will testify regarding facts pertaining to the claims, defenses and	
	damages in this lawsuit.	
21.	Donna Hudson	May Testify
	c/o Preg O'Donnell and Gillett 901 Fifth Avenue, Suite 3400	
	Seattle, Washington 98164	
	Donna Hudson was an elementary school Principal for Sequim School	
	District during times relevant to the issues described in the Complaint.	
	She will testify regarding facts pertaining to the claims, defenses and	
	damages in this lawsuit.	

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22.	Dena Riccobene	May Testify
	2001 Bluebell Dr	
	Lynden, WA 98264	
	Dena Riccobene was a school librarian at Sequim School District during	
	all times relevant to the issues described in the Complaint. She will	
	testify regarding facts pertaining to the claims, defenses and damages in	
22	this lawsuit.	N
23.	Larry Hill 32 Plum Tree LN	May Testify
	Sequim, WA 98382	
	Larry Hill was a retired Sequim School District teacher at Sequim School	
	District during times relevant to the issues described in the Complaint. He will testify regarding facts pertaining to the claims, defenses and	
	damages in this lawsuit.	
24.	Amy Klosterman	May Testify
-•	Klosterman Law, PLLC	, = 0.001
	P.O. Box 17130	
	Seattle, WA 98127	
	Amy Klosterman conducted an investigation into whether Dr. Clark	
	investigated a rumor regarding Plaintiff and former superintendent Gary	
	Neal. She will testify regarding facts pertaining to the claims, defenses	
2.5	and damages in this lawsuit.) f
25.	Jim Stoffer 570 America Blvd	May Testify
	Sequim, WA 98382	
	Jim Stoffer was a member of the Sequim School District School Board	
	at times relevant to the issues described in the Complaint. He will testify regarding the facts pertaining to the claims, defenses and damages in	
	this lawsuit.	
26.	Brian Kuh	May Testify
	914 N Beverage St Sequim, WA 98382	
	Brian Kuh was a member of the Sequim School District School Board	
	at times relevant to the issues described in the Complaint. He will testify	
	regarding the facts pertaining to the claims, defenses and damages in this lawsuit.	
	uns iawsuit.	

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	27.	Mark Pekar	May Testify
1		Sequim Adventist Church	
2		30 Sanford Lane	
2		Sequim, WA 98382	
3			
		Mark Pekar was a pastor at Sequim Adventist Church at times relevant	
4		to the issues described in the Complaint. He will testify regarding the	
5		facts pertaining to his meeting with Hanna McAndie and Ian McAndie	
3		regarding their marriage.	
6			

Plaintiff reserves the right to call Defendants' witnesses in her case in chief. Plaintiff sent Clark a link to 40 exhibits on March 2, subsequently adding additional exhibits which were either documents produced by SSD in discovery or photos of Plaintiff and her then husband. Plaintiff expects to use the photos for illustrative purposes. Plaintiff received Defendants' exhibits March 3rd at 8:35 a.m.

EXHIBIT LIST AND OBJECTIONS

A. Plaintiff's Exhibit List and Objections

No.	Description	Authentici ty	Admissibil ity	Objection	Admitt ed
1.	HM CTB Incident Report 5227-001968-977	Disputed	Disputed	FRE 401 (b) Not necessary/relevant FRE 403 unfair prejudice (one sided); confusing the issues; wasting time; needlessly presenting cumulative evidence	
2.	Plaintiff's Job Applications 5227-1894 to 001967	Disputed	Disputed	FRE 401 (b) Not necessary/relevant FRE 403 wasting time; needlessly presenting cumulative evidence	

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l 2	3.	RC Letter to Harrison re Job Change SSD_HM_01577	Stipulated	Stipulated		
3 4	4.	Flood Investigation SSD_HM_01739 to 01786	Stipulated	Disputed	FRE 401(b) Not necessary/relevant	
5	5.	Balint 10.30.20 Email to HM 5227-001978	Stipulated	Stipulated		
7 8 9	6.	2.26.21 HM Retaliation Complaint re Confidentiality Breach DDS_HM_004975	Stipulated	Disputed	FRE 401(b) Not necessary/relevant	
1	7.	Policy 3210-3000 Nondiscrimination 5227-001979-80	Stipulated	Disputed	FRE 401(b) Not necessary/relevant	
2 3 4	8.	Policy 4220P Resolution of Employee Complaints 5227-001981to 82	Stipulated	Stipulated		
5 5 7	9.	Policy 5010-5000 Nondiscrimination 5227-001983 to 001985	Stipulated	Stipulated		
3	10.	Policy 5010P Procedure Nondiscrimination 5227-001986 to 1994	Stipulated	Stipulated		
2	11.	Policy 5270 Resolution of Staff Complaints 5270-001995	Stipulated	Stipulated		
3 1 5	12.	Policy 5270P Procedure 4220P Guidelines for Resolving Employee Grievances. 5227-001996	Stipulated	Stipulated		
7	13.	Policy 4220P Resolving	Stipulated	Stipulated		

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						Γ
1 -		Employee Complaints 5227-001997-1998				
3 4	14.	HM Email to SB Formal Complaint SH 5227-001999	Stipulated	Stipulated		
5 6	15.	BG Letter to HM Closing Klosterman Investigation 5227-002000	Stipulated	Stipulated		
7 8	16.	Clark Survey Monkey 5227-002001-2029	Stipulated	Stipulated		
9	17.	HM SH Email to VB and Responses 5227-002039- 002042	Stipulated	Stipulated		
11 12 13 14 15 16 17 18	18.	HM HRC Charge 5227-002039-2042	Stimulated	Stipulated NOTE: Defendants also offered this exhibit, including Plaintiff's statement which is not included in this copy		
9 20 21 -	19.	VB Receipt of Claim Letter 5227-002043 to 2053	Stipulated	Stipulated		
22 23 24	20.	JM Draft Reprimand VR 5227-002054-2056	Disputed	Disputed	FRE 401(b) Not necessary/relevant FRE 403 wasting time; confusing issues; needlessly	
25 26 27					presenting cumulative evidence	

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21.	HM May 17 2019	Stipulated	Disputed	FRE 401(b)
	Attachment			Not
	5227-2057 to 2074		**Several	necessary/relevant
			documents	FRE 403
			included,	wasting time;
			please	confusing issues;
			break into	needlessly
			separate	presenting
			exhibits	cumulative
22.	M Diamaell Letter to	Ctimulated	Diamutad	evidence
22.	M Piersoll Letter to	Stipulated	Disputed	FRE 401(b) Not
	Superintendent 5227-002075 to		**Several	necessary/relevant
	2090		documents	FRE 403
	2070		included,	wasting time;
			please	confusing issues;
			break into	needlessly
			separate	presenting
			exhibits	cumulative
				evidence
23.	Stoffer 2.23.21	Stipulated	Disputed	FRE 401(b)
	Email to Jane re	1	1	Not
	Bullying			necessary/relevant
	DAY 2021 003857			FRE 403
				wasting time;
				confusing issues;
				needlessly
				presenting
				cumulative
				evidence
24.	HM Appeal	Stipulated	Stipulated	
	Haggard			
	Investigation			
25.	SSD_HM_004974_ HM Email re	Stipulated	Dianutad	FRE 401(b)
4 J.	Reporting VR	Stipulated	Disputed	Not
	SSD_HM 02962			necessary/relevant
	555_IIIVI 02702			FRE 403
				wasting time;
				confusing issues;
				needlessly
				presenting
				cumulative
				evidence
26.	C. Smith Email	Stipulated	Disputed	FRE 401(b)
	SSD_HM-02963		1	Not
				necessary/relevant

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					FRE 403	
1					wasting time;	
2					needlessly	
2					presenting	
3					cumulative evidence	
4	27.	Winter 2019	Stipulated	Disputed	FRE 401(b)	
	27.	Newsletter	Supulated	Disputed	Not	
5		SSD_HM_04031-			necessary/relevant	
6		04034			FRE 403	
					wasting time;	
7					needlessly presenting	
8					cumulative	
					evidence	
9	28.	V. Balint Letter	Stipulated	Stipulated	FRE 401(b)	
10		SSD_HM_01168			Not	
1 1					necessary/relevant FRE 403	
11					wasting time;	
12					confusing issues;	
12					needlessly	
13					presenting	
14					cumulative	
15	29.	HM Email to VB	Stipulated	Stipulated	evidence	
13	2).	and Response	Supulated	Supulated		
16		SSD_HM_01169-		*Incomplet		
17		1170		e email		
				doesn't		
18				provide the entire		
19				document		
	30.	HM Email to BG	Stipulated	Stipulated		
20		and VB				
21		SSD_HM_01172		*Incomplet		
,,				e email doesn't		
22				provide the		
23				entire		
24				document		
24	31.	BG Email to RC	Stipulated	Stipulated		
25		SSD_HM_01189				
26						
,,						
27						

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1	32.	VB Letter of Direction to VR	Stipulated	Disputed	FRE 401(b) Not	
2		SSD_HM_01258- 1259			necessary/relevant FRE 403	
3		1209			wasting time;	
4					confusing issues; needlessly	
					presenting	
5					cumulative evidence	
6						
7	33.	SM Letter to VB SSD_HM_01299 to	Stipulated	Disputed	FRE 401(b) Not	
8		01300			necessary/relevant	
9					FRE 403 wasting time;	
					confusing issues;	
10					needlessly	
11					presenting cumulative	
12					evidence	
13	34.	BG Email to JM SSD_HM_1301	Stipulated	Stipulated	FRE 401(b) Not	
		555_1111_1501		*please	necessary/relevant	
14				remove highlightin	FRE 403 wasting time;	
15				g	confusing issues;	
16					needlessly	
17					presenting cumulative	
18					evidence	
19	35.	BG Email to RC SSD_HM_01443	Stipulated	Stipulated		
20	36.	AK Email to VB SSD_HM_01450	Stipulated	Stipulated		
21	37.	VB Email to AK	Stipulated	Stipulated		
	38.	SSD_HM_01498 VK Letter	Stipulated	Disputed	FRE 401(b)	-
22		SSD_HM_02640	1	1	Not	
23					necessary/relevant FRE 403	
24					wasting time;	
25					confusing issues; needlessly	
26					presenting	
					cumulative	
27		<u> </u>	<u> </u>	1	evidence	\dashv

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	5227-002000		Disputed	FRE 401(b)
				Not
				necessary/relevant
				FRE 403
				wasting time;
ļ				confusing issues;
				needlessly
				presenting
ļ				cumulative evidence
40.	JM Letter to VR	Stimulated	Dianutad	FRE 401(b)
40.	SSD_HM_02644	Stipulated	Disputed	Not
	33D_11W1_020 44			necessary/relevant
ļ				FRE 403
				wasting time;
				confusing issues;
				needlessly
				presenting
				cumulative
				evidence
41.	Photograph			Untimely
	5227-004000			disclosure, FRE
				401(b) not
				relevant; FRE 403
				cumulative
42.	Photograph			Untimely
	5227-004001			disclosure, FRE
				401(b) not
				relevant; FRE 403
43.	Dhotograph			cumulative Untimely
43.	Photograph 5227-004002			disclosure, FRE
	3227-004002			401(b) not
				relevant; FRE 403
				cumulative
44.	Photograph			Untimely
	5227-004004			disclosure, FRE
				401(b) not
				relevant; FRE 403
				cumulative
45.	Photograph			Untimely
	5227-004005			disclosure, FRE
				401(b) not
				relevant; FRE 403
4.5	DI :			cumulative
46.	Photograph 5227-004006			Untimely disclosure, FRE

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			401(b) not
1			relevant; FRE 403
2			cumulative
2	47.	Photograph	Untimely
3		5227-004007	disclosure, FRE
			401(b) not
4			relevant; FRE 403 cumulative
5	48.	Dhotograph	Untimely
	40.	Photograph 5227-004008	disclosure, FRE
6		3227 004000	401(b) not
7			relevant; FRE 403
,			cumulative
8	49.	Photograph	Untimely
9		5227-004009	disclosure, FRE
9			401(b) not
10			relevant; FRE 403
	7.0	70.	cumulative
11	50.	Photograph	Untimely
12		5227-004010	disclosure, FRE 401(b) not
12			relevant; FRE 403
13			cumulative
14	51.	Photograph	Untimely
17		5227-004011	disclosure, FRE
15			401(b) not
1.0			relevant; FRE 403
16			cumulative
17	52.	Photograph	Untimely
1.0		5227-004012	disclosure, FRE
18			401(b) not relevant; FRE 403
19			cumulative
	53.	Photograph	Untimely
20		5227-004013	disclosure, FRE
21			401(b) not
21			relevant; FRE 403
22			cumulative
23	54.	Photograph	Untimely
23		5227-004014	disclosure, FRE
24			401(b) not relevant; FRE 403
25			cumulative
25	55.	Photograph	Untimely
26		5227-004015	disclosure, FRE
			401(b) not
27	<u> </u>	1	

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		relevant; FRE 403
		cumulative
6.	Photograph	Untimely
	5227-004016	disclosure, FRE
		401(b) not
		relevant; FRE 403
		cumulative
7.	Photograph	Untimely
	5227-004017	disclosure, FRE
		401(b) not
		relevant; FRE 403
		cumulative
58.	Photograph	Untimely
	5227-004018	disclosure, FRE
		401(b) not
		relevant; FRE 403
		cumulative
59.	Photograph	Untimely
	5227-004019	disclosure, FRE
		401(b) not
		relevant; FRE 403
		cumulative
0.	Photograph	Untimely
	5227-004020	disclosure, FRE
		401(b) not
		relevant; FRE 403
		cumulative
1.	Photograph	Untimely
	5227-004021	disclosure, FRE
		401(b) not
		relevant; FRE 403
		cumulative
52.	Photograph	Untimely
	5227-004022	disclosure, FRE
		401(b) not
		relevant; FRE 403
		cumulative
3.	Photograph	Untimely
	5227-004023	disclosure, FRE
		401(b) not
		relevant; FRE 403
		cumulative
54.	Photograph	Untimely
	5227-004021	disclosure, FRE
		401(b) not
		relevant; FRE 403
		cumulative

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65.	Photograph	Untimely
	5227-004025	disclosure, FRE
		401(b) not
		relevant; FRE 403
		cumulative
66.	Photograph	Untimely
	5227-004026	disclosure, FRE
		401(b) not
		relevant; FRE 403
		cumulative
67.	Photograph	Untimely
	5227-004027	disclosure, FRE
		401(b) not
		relevant; FRE 403
	DI I	cumulative
68.	Photograph	Untimely
	5227-004028	disclosure, FRE
		401(b) not
		relevant; FRE 403
69.	Dhatagraph	cumulative
09.	Photograph 5227-004029	Untimely disclosure, FRE
	3227-004029	401(b) not
		relevant; FRE 403
		cumulative
70.	Photograph	Untimely
, 0.	5227-004030	disclosure, FRE
		401(b) not
		relevant; FRE 403
		cumulative
71.	Photograph	Untimely
	5227-004031	disclosure, FRE
		401(b) not
		relevant; FRE 403
		cumulative
72.	Photograph	Untimely
	5227-004032	disclosure, FRE
		401(b) not
		relevant; FRE 403
70		cumulative
73.	Photograph	Untimely
	5227-004033	disclosure, FRE
		401(b) not
		relevant; FRE 403
74	Dhatagraph	cumulative
74.	Photograph	Untimely

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$_{1}$			401(b) not relevant; FRE 403
2			cumulative
2	75.	Photograph	Untimely
3		5227-004035	disclosure, FRE
			401(b) not
4			relevant; FRE 403
5	76.	Photograph	cumulative Untimely
	70.	5227-004036	disclosure, FRE
6		3227 004030	401(b) not
7			relevant; FRE 403
′			cumulative
8	77.	Photograph	Untimely
9		5227-004037	disclosure, FRE
9			401(b) not
0			relevant; FRE 403
	70	TO F. T. T.	cumulative
1	78.	JS Email to JP	Untimely
2		DAY 2021 003857	disclosure, FRE
			401 (b) not relevant as it
.3			relates to conduct
4			of M. Piersoll;
.4			FRE 403 unduly
.5			prejudicial
	79.	JM Email to SR	FRE 401 (b) not
.6		SSD_HM 01298	relevant.
7	80.	JM Letter to VR	
	0.1	SSD_HM 02644	TT (: 1
.8	81.	JM Narrative SSD_HM_0243	Untimely disclosure, FRE
9		SSD_HW_0243	401(b) not
			relevant; FRE 801
20			hearsay
$_{21}$	82.	JS Email to AK	FRE 401(b); FRE
1		SSD_HM_02418	Untimely
22			disclosure, 801
,, _			hearsay
23	83.	BK Email to JS; JS	Untimely
24		to AK	disclosure, FRE
		SSD_HM_02532-	401(b) relevance;
25	84.	02533 AK Email to VB	FRE 801 hearay Untimely
26	04.	SSD_HM_01450	disclosure, ER
		555_1111_01750	401(b)
27 -		l l	1 .02(0)

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85.	Klosterman	Untimely
	Interview Notes	disclosure, FRE
	SSD_HM_02632-	401 relevance;
	02638	FRE 801 hearsay
86.	Larry Jeffryes'	Untimely
	Statement	disclosure, FRE
	SSD_HM_01761-	401; FRE 801
	01762	hearssay.
87.	SM Email to VB,	Untimely
	MD, BG	disclosure, FRE
	SSD_HM_01299-	401(b) not
	01300	relevant; FRE 801
		hearsay as
		statement of JM.
88.	Parent Letter to JP	Untimely
	SSD_HM_00106-	disclosure; author
	00111	unknown; 401(b)
		not relevant as
		addresses
		Superintendent
		Pryne; FRE 801
00	A mida Damida –	hearsay
89.	Anita Benitez	FRE 401
	interview notes	relevance; FRE
	SSD_HM_01911- 02013	801 hearsay; witness is slated to
	02013	testify so notes are
		cumulative FRE
		403.
90.	Salaries of	FRE 401
	Certificated Staff	relevance.
	2017-18	
	SSD_HM_02543	
91.	SSD Visitor's Map	FRE 401
	SSD_HM_010135	relevance; 801
		hearsay
92.	SSD Letter re:	Untimely
	Langston and Clark	disclosure; FRE
	SSD_HM_01486-	401 relevance;
	01487	FRE 801 hearsay.
93.	VB Email to VR	Untimely
	SSD_HM_010318	disclosure; FRE
		401 relevance
94.	VR Separation	Untimely
	Notice	disclosure; FRE
	SSD_HM_010319	401 relevance;
		801 hearsay.

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SSD Board Minutes Untimely 95. 5227-004050disclosure; FRE 004053 401 relevance Policy 1620 96. 5227-004054 Procedure 1620 Untimely 97. disclosure; FRE Form 401 Relevance 5227-004055-004057 98. SSD Newsletter Fall Untimely disclosure; FRE 2019 SSD_HM_04365-401 Relevance 04372 Photograph Untimely 99. 5227-004003 disclosure; FRE 401 relevance

B. Defendants' Exhibit List and Objections

		Defenda	nt's Exhibits			
Ex.	Date &	Bates No.	Authenticity	Admissibili	Objectio	<u>Admitte</u>
No.	Description			<u>ty</u>	<u>n</u>	<u>d</u>
501.	September 20, 2018 Email exchange between H.McAndie and J.Maughan re: office hours	SSD_HM_0057 86	Stipulated	Disputed	FRE 401; 403; 801	
502.	October 1, 2018 Email from H.McAndie to G.Neal re: Today's Schedule	SSD_HM_0101 73	Stipulated	Disputed	FRE 401; 403	
503.	January 29, 2019 Email from J.Maughan to M.Seabolt re: Subonline!	SSD_HM_0313 3	Stipulated	Disputed	FRE 401; 403; 801	
504.	April 12, 2019 Email from H.McAndie to G.Neal re:	SSD_HM_0570 1	Stipulated	Disputed	FRE 401; 403; 801	

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	Schedule				
505.	July 11, 2019 Email from M.Lyke to D. Apeland and	SSD_HM_0941 5	Stipulated	Disputed	FRE 401; 403; 801
	forwarded to J. Maughan re: FW no subject				
506.	July 24, 2019 Email from H.McAndie to J.Maughan cc: R.Clark re: Summer hours	SSD_HM_0049 91	Stipulated	Disputed	FRE 401; 403; 801
507.	October 30, 2019 Email from M.Lyke to J.Maughan and T.Norman re: Hanna	SSD_HM_0337 3	Stipulated	Disputed	FRE 401; 403; 801
508.	July 1, 2019 S.Flood Investigation re H.McAndie complaint about V.Riccobene	SSD_HM_0173 9- SSD_HM_0178 6	Stipulated	Stipulated	
509.	May 21, 2019 Evaluation of H.McAndie by G.Neal	SSD_HM_0000 01	Stipulated	Stipulated	
510.	May 6, 2019 Email from H.McAndie to P.Lund containing 2019 Back to School Fair dates re: copy of last year's flyer?	SSD_HM_0056 67- SSD_HM_0056 71	Stipulated	Disputed	FRE 401; 403; 801
511.	October 29, 2019 J.Maughan handwritten note to R.Clark re H.McAndie absence and morale	SSD_HM_0058 29	Disputed	Disputed	FRE 401; 403; 801; 901

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1 2	512.	December 17, 2019 J.Maughan email to H.McAndie re: Travel Request	SSD_HM_0099 38- SSD_HM_0099 39	Stipulated	Disputed	FRE 401; 403; 801
3	513.	March 4, 2019	SSD_HM_0057	Stipulated	Disputed	FRE
4 5		H.McAndie email to	47- SSD_HM_0057			401; 403; 801
6		J.Maughan cc: G.Neal re: CTB recommendation	50			
7		s				
8	514.	November 12, 2019	SSD_HM_0054 98	Stipulated	Disputed	FRE 401;
9		H.McAndie email to	98			401; 403; 801
10		J.Maughan and R.Alcafaras re:				
11	515	Website	GGD ID4 0054	C.: 1 . 1	D: . 1	EDE
12	515.	2019	SSD_HM_0054 90-	Stipulated	Disputed	FRE 401;
13		H.McAndie email to J.	SSD_HM_0054 92			403; 801
14		Maughan re: HMc Weekly				
15	516.	Schedule December 17,	SSD_HM_0054	Stipulated	Disputed	FRE
16	310.	2019 H.McAndie	63- SSD_HM_0054	Supulated	Disputed	401; 403; 801
17 18		email to J.Maughan re:	64			
		GM and WM	222 - 22 - 22 - 2			
19 20	517.	December 18, 2019	SSD_HM_0054 62	Stipulated	Disputed	FRE 401;
21		H.McAndie email with				403; 801
22		J.Maughan re: Suggestion				
23	518.	December 26,	SSD_HM_0054	Stipulated	Disputed	FRE
24		2019 Email from H.McAndie to	52- SSD_HM_0054			401; 403; 801
25		J.Maughan, V. Knieper and	53			
26		R.Clark re: Leave Revision				
27						

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	519.	January 21, 2020	SSD_HM_0054	Stipulated	Disputed	FRE	
	319.	Email from	41-	Supulated	Disputed	401;	
		H.McAndie to	SSD_HM_0054			403; 801	
		J.Maughan re:	42				
3		Schedule 1/20-					
. -	720	1/24	222 222				
1	520.	January 22, 2020 Email from	SSD_HM_0054 38-	Stipulated	Disputed	FRE 401;	
5		H.McAndie to	SSD_HM_0054			401,	
_		J.Maughan re:	39			103, 001	
5		Time in					
7 L		subonline					
	521.	January 30, 2020	SSD_HM_0054	Stipulated	Disputed	FRE	
3		H.McAndie	35			401;	
)		email to J.Maughan re:				403; 801	
		Haller CTB					
)		cases					
	522.	March 10, 2020	SSD_HM_0054	Stipulated	Disputed	FRE	
		H.McAndie	14-		_	401;	
		email to	SSD_HM_0054			403; 801	
3		J.Maughan re:	15				
.		Draft for principals					
ŀ <u> </u>	523.	July 6, 2020	SSD_HM_0052	Stipulated	Disputed	FRE	
5	020.	H.McAndie	49-		2 isp cicc c	401;	
_		email to	SSD_HM_0052			403; 801	
5		J.Maughan re:	52				
7		Check in 6/29-					
3 	524.	7/3 July 8, 2020	SSD_HM_0052	Stipulated	Disputed	FRE	
`	<i>32</i> 4 .	H.McAndie	38-	Supulated	Disputed	401;	
)		email to	SSD_HM_0052			403; 801	
,		J.Maughan re:	39				
		PIO information					
	525.	July 9, 2020	SSD_HM_0051	Stipulated	Disputed	FRE	
2		J.Maughan to H.McAndie,	95- SSD_HM_0051			401; 403; 801	
-		M.Lyke,	96			703, 601	
3		R.Alcafaras and					
.		M.Seabolt re: P-					
		EBT Posts					
5	526.	July 8, 2020	SSD_HM_0052	Stipulated	Disputed	FRE	
$\begin{bmatrix} & & & & & & & & & & & & & & & & & & &$		J.Maughan to	38-			401;	
5		H.McAndie re: PIO information	SSD_HM_0052 39			403; 801	
, ∟			J7				

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527.	July 15, 2020	SSD_HM_0051	Stipulated	Disputed	FRE
	H.McAndie to J.Maughan re:	76			401; 403; 801
700	Work log	GGD IIM 0051	G.: 1 . 1	D: 1	EDE
528.	September 15, 2020	SSD_HM_0051 19	Stipulated	Disputed	FRE 401;
	H.McAndie to J.Maughan re: MV Calls				403; 801
529.	September 17,	SSD_HM_0051	Stipulated	Disputed	FRE
	2020 H.McAndie	04- SSD_HM_0051			401; 403;
	email to J.Maughan re:	08			801; duplicate
	MV calls				of Ex. 528
530.	September 25, 2020	SSD_HM_0051 01-	Stipulated	Disputed	FRE 401;
	H.McAndie email to	SSD_HM_0051 02			403; 801
	J.Maughan re: MV issues	02			
531.	September 25,	SSD_HM_0050	Stipulated	Disputed	FRE
	2020 H.McAndie	92- SSD_HM_0050			401; 403; 801
	email to J.Maughan re: How to Contact	93			
522	Hanna Santamban 2	CCD LIM 0055	Ctimulated	Diamutad	EDE
532.	September 3, 2019	SSD_HM_0055 76-	Stipulated	Disputed	FRE 401;
	H.McAndie email to R.Clark	SSD_HM_0055 77			403; 801
	re: Reporting of absences				
533.	August 16, 2019 H.McAndie	SSD_HM_0351 0-	Stipulated	Disputed	FRE 401;
	email to R.Clark and J.Maughan	SSD_HM_0351 1,			403; 801
	re: HMc Weekly Schedule 8/19-	SSD_HM_0049 87-			
	8/23	SSD_HM_0049 88			
534.	September 9, 2019	SSD_HM_0055 37-	Stipulated	Disputed	FRE 401;
	H.McAndie	SSD_HM_0055			403; 801

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		J.Maughan and				
1		T.Norman re: tentative				
2		schedule for the				
3		week				
4	535.	September 16, 2019	SSD_HM_0055 23-	Stipulated	Disputed	FRE 401;
		H.McAndie	SSD_HM_0055			403; 801
5		email to R.Clark,	26 SSD_HM_0055			
6		J.Maughan, T.Norman and	SSD_HM_0055 29-			
7		D. Apeland	SSD_HM_0055			
8		re:HMc Weekly Schedule	30			
9	536.	September 16, 2019	SSD_HM_0055 20-	Stipulated	Disputed	FRE 401;
10		H.McAndie email to R.Clark	SSD_HM_0055 22			403; 801
11		re: HMc Weekly				
12	537.	Schedule September 19,	SSD_HM_0055	Stipulated	Disputed	FRE
13	337.	2019	15-	Supulated	Disputed	401;
		H.McAndie	SSD_HM_0055 16			403; 801
14		email to R.Clark, J.Maughan,	10			
15		T.Norman,				
16		M.Lyke re: HMc Weekly				
17		Schedule				
	538.	October 1, 2019 H.McAndie	SSD_HM_0055 08-	Stipulated	Disputed	FRE 401;
18		email to R.Clark,	SSD_HM_0055			403; 801
19		J.Maughan, T. Norman re: HMc	09			
20		Weekly				
21	539.	Schedule	SSD_HM_0058	Dianutad	Disputad	FRE
22	339.	October 29, 2019	29	Disputed	Disputed	401;
23		handwritten note				403;
		from J.Maughan to R.Clark re				801; 901
24		H.McAndie				
25		absence causing morale issues				
26		and favoritism				
27						

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1	540.	November 12, 2019	SSD_HM_0054 99-	Stipulated	Disputed	FRE 401;
2		H.McAndie email to R.Clark	SSD_HM_0055 00			403; 801
3		and T.Norman				
4		re: HMc Weekly Schedule				
5	541.	November 20, 2019 T.Norman	SSD_HM_0100 98-	Stipulated	Disputed	FRE 401;
6		email to	SSD_HM_0101 00			403; 801
7		J.Maughan re: HMc Weekly Schedule	00			
8	542.	November 20,	SSD_HM_0054	Stipulated	Disputed	FRE
9		2019 H.McAndie	90- SSD_HM_0054			401; 403; 801
10		email to J.Maughan	92			
11		saying she will include her on				
12		weekly schedule after J.Maughan				
13		was looking for				
14	543.	her November 22,	SD_HM_008969	Stipulated	Disputed	FRE
15		2019 H.McAndie				401; 403; 801
16		email to R.Clark, J.Maughan,				
17		M.Lyke, T.				
18		Norman re weekly schedule				
19	544.	December 3, 2019	SSD_HM_0054 72-	Stipulated	Disputed	FRE 401;
20		H.McAndie	SSD_HM_0054 73			403; 801
21		email to R.Clark re: HMc Weekly	//3			
22		Schedule 12/2- 12/6				
23	545.	December 16, 2019	SSD_HM_0054 66-	Stipulated	Disputed	FRE 401;
24		H.McAndie	SSD_HM_0054			403; 801
25		email to R.Clark, J.Maughan,	67			
26		T.Norman and M.Lyke re: HMc				
27			1	1	- 1	l l

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1		Weekly Schedule				
2	546.	January 21, 2020 H.McAndie	SSD_HM_0054 41-	Stipulated	Disputed	FRE 401;
3		email to J.Maughan	SSD_HM_0054 42			403; 801
5		regarding schedule				
6	5.45	accommodations	ggp ID4 0050	G: 1 · 1	D: 1	TD F
7	547.	October 29, 2019 H.McAndie	SSD_HM_0058 16	Stipulated	Disputed	FRE 401;
8		email to R.Clark re sickness and				403; 801
9		out part of morning				
10 11	548.	June 26, 2018 H.McAndie	SSD_HM_0058 00	Stipulated	Disputed	FRE 401;
12		email to L.Lestage re:				403; 801
13		Truancy End of Year Reports				
14	549.	September 6, 2018	SSD_HM_0057 93	Stipulated	Disputed	FRE 401;
15 16		H.McAndie email to G.Neal, T.Norman not				403; 801
17		making it to meeting				
18	550.	September 14, 2018	SSD_005790	Stipulated	Disputed	FRE 401;
19 20		H.McAndie email to				403; 801
21	551	L.Parker re: OPA MEMO #5	GGD 1D4 0055	G.: 1 · 1	Di I	TD F
22	551.	October 17, 2018	SSD_HM_0057 71	Stipulated	Disputed	FRE 401;
23		H.McAndie email to				403; 801
24		B.Cooper re: Request for Information				
2526	552.	October 31, 2018	SSD_HM_0057 57	Stipulated	Disputed	FRE 401;
27		H.McAndie email to				403; 801

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1		S.Crutchfield re: Sequim Ground Breaking				
2	553.	March 7, 2019	SSD_HM_0057	Stipulated	Disputed	FRE
3		H.McAndie email to	36- SSD_HM_0057			401; 403; 801
4		P.Ofarrell re:	38			
5		Custom App Update				
6	554.	March 22, 2019 H.McAndie	SSD_HM_0057 32	Stipulated	Disputed	FRE 401;
7		email to	32			403; 801
8		K.Bushy, S.Jefferson re:				
9		Attendance				
10		Meeting and inability to meet				
		regarding				
11	555.	truancy issues April 24, 2019	SSD_HM_0056	Stipulated	Disputed	FRE
12		H.McAndie	76-	1	1	401;
13		email to P.Ofarrell re:	SSD_HM_0056 77			403; 801
14		Custom App				
15	556.	Update May 14, 2019	SSD_HM_0056	Stipulated	Disputed	FRE
16		H.McAndie email to J.Lopez,	33- SSD_HM_0056			401; 403; 801
17		T.Stratton,	34			705, 601
18		D.Hudson re: Referral for				
		Truancy Court				
19	557.	September 19, 2019	SSD_HM_0055 14	Stipulated	Disputed	FRE 401;
20		H.McAndie				403; 801
21		email to several people re: Out of				
22		the Office				
23	558.	November 14, 2019	SSD_HM_0054 96	Stipulated	Disputed	FRE 401;
24		H.McAndie				403; 801
25		email to M.Vander Velde				
		re:CTB				
26		Hearing				
27						

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559.	November 27,	SSD_HM_0548	Stipulated	Disputed	FRE
	2019	1-			401;
	H.McAndie	SSD_HM_0548			403; 801
	email to	3			
	H.Liebert and				
	M.Field re:				
	Newsletter				
560.	Deadlines December 4, 219	CCD 11M 0054	Ctimulated	Disputed	FRE
300.	H.McAndie	SSD_HM_0054 70	Stipulated	Disputed	401;
	email to	70			401, 403; 801
	H.Liebert and				403, 801
	M.Field re: Ad				
	Copy Reminder				
561.	January 15, 2020	SSD_HM_0054	Stipulated	Disputed	FRE
	H.McAndie	45	1	1	401;
	email to				403; 801
	J.Maughan re:				
	Today				
562.	January 23, 2020	SSD_HM_0054	Stipulated	Disputed	FRE
	H.McAndie	37			401;
	email to				403; 801
	L.Stauffer re:				
	Meeting				
5.62	tomorrow 1-22?	CCD IIM 0054	C4:1-41	D:	EDE
563.	February 19, 2020	SSD_HM_0054 34	Stipulated	Disputed	FRE 401;
	H.McAndie	34			403; 801
	email to				703, 001
	L.Stauffer				
	re:CTB				
564.	July 16, 2020	SSD_HM_0100	Stipulated	Disputed	FRE
	T.Norman email	49-			401;
	to J.Maughan	SSD_HM_0110			403; 801
	re:Pandemic	50			
	EBT				
565.	August 10,	SSD_HM_0051	Stipulated	Disputed	FRE
	2020 M.Lyke	49			401;
	email to				403; 801
	H.McAndie re:				
566	Meeting?	CCD III 0071	G41:: 1 : 1	D: (1	EDE
566.	September 8,	SSD_HM_0051	Stipulated	Disputed	FRE
	2020 H.McAndie	23-			401;
	email to J.Lopez	SSD_HM_0051 24			403; 801
	re: [redacted]	∠ +			

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567.	September 30,	SSD_HM_0050	Stipulated	Disputed	FRE
	2020	88			401;
	H.McAndie				403; 801
	email to R.Larsen re:				
	possible MKV				
	students				
568.	October 27,	SSD_HM_0050	Stipulated	Disputed	FRE
	2020	32-	1 1 1 1 1 1 1 1		401;
	H.McAndie	SSD_HM_0050			403; 801
	email to	33			
	T.Thorson,				
	M.Vander				
	Velde, S.Thorson,				
	J.Maughan and				
	V. Riccobene re:				
	Truancy Court				
	Student and				
	McKinney				
-	Vento Student	000 200 0000		D	
569.	October 28,	SSD_HM_0050	Stipulated	Disputed	FRE
	2020 H.McAndie to	31			401; 403; 801
	J.Maughan re:				403, 601
	Checking in				
570.	October 4, 2018	SSD_HM_0045	Disputed	Disputed	FRE
	J.Maughan to T.	779-			401;
	Stratton re: (no	SSD_HM_0045			403;
	subject)	782			801; 901
571.	September 18,	SSD_HM_0057	Stipulated	Disputed	FRE
	2018 R.Hill email to	87- SSD_HM_0057			401; 403; 801
	J.Maughan re:	89			703, 001
	Website				
	Calendars				
572.	November 4,	SSD_HM_0055	Stipulated	Disputed	FRE
	2019	03-			401;
	H.McAndie	SSD_HM_0055			403; 801
	email to R.Clark	04			
	re: Back to				
573.	School Fair August 2, 2018	SSD_HM_0101	Stipulated	Disputed	FRE
313.	S.McIntire email	77-	Supulated	Disputed	401;
	to J.Maughan re:	SSD_HM_0101			403; 801
	Calendars for	78			
	parents				

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574.	October 23,	SSD_HM_0057	Stipulated	Disputed	FRE
	2018 D.Lamb email to	69			401;
	H.McAndie and				403; 801
	J.Maughan re: IMPORTANT				
	District Calendar				
	Blank on Website				
575.	April 22, 2019	SSD_HM_0056	Stipulated	Disputed	FRE
	H.McAndie	92			401;
	email to				403; 801
	A.Tjemsland re:dates				
576.	May 16, 2019	SSD_HM_0056	Stipulated	Disputed	FRE
	H.McAndie	32			401;
	email to				403; 801
	A.Tjemsland re: Calendar				
577.	August 12, 2019	SSD_HM_0049	Stipulated	Disputed	FRE
	H.McAndie	89-			401; 403
	email to	SSD_HM_0049			
	V.Knieper and J.Maughan re:	90			
	non				
	discrimination				
	statement				
578.	June 15, 2020 J.Maughan email	SSD_HM_0052 71-	Stipulated	Disputed	FRE 401;
	to H.McAndie	SSD_HM_0052			401, 403; 801
	re: Another one	72			103, 001
	:)				
579.	October 4, 2019	SSD_HM_0063	Stipulated	Disputed	FRE
	R.Stanton email to J.Maughan re:	96- SSD_HM_0063			401; 403; 801
	FYI-Truancy-	97			103, 001
	info email				
580.	March 27, 2019	SSD_HM_0057	Stipulated	Disputed	FRE
	S.Jefferson	30-			401;
	email to J.Maughan,	SSD_HM_0057 31			403; 801
	G.Neal,				
	R.Stanton re:				
7 01	Court 3/27	00D ID : 005=		D : :	
581.	October 31, 2018	SSD_HM_0057 63	Stipulated	Disputed	FRE 401;
	1711111				

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	email to Deputy Clerk re: UPDATES				
582.	April 8, 2019 Email from H.McAndie to B.Brown re: Petitions Email #9	SSD_HM_0049 97- SSD_HM_0050 01	Stipulated	Disputed	FRE 401; 403; 801
583.	September 25, 2020 Email from H.McAndie to T.Lassus and J. Clark re: SSD Contempts	SSD_HM_0050 95- SSD_HM_0050 99	Stipulated	Disputed	FRE 401; 403; 801
584.	October 10, 2019 Email from S.Jefferson to K.Bushy, R.Stanton, J.Maughan re: Truancy	SSD_HM_0055 06- SSD_HM_0055 07	Stipulated	Disputed	FRE 401; 403; 801
585.	November 14, 2019 Email from H.McAndie to [redacted], V.Riccobene re: Court	SSD_HM_0054 94	Disputed	Disputed	FRE 401; 403; 801; 901
586.	March 3, 2020 email from parent to H.McAndie re: truancy meeting	SSD_HM_0100 79- SSD_HM_0100 80	Disputed	Disputed	FRE 401; 403; 801; 901
587.	September 27, 2018 email from D.Lamb to J.Maughan re: available after school?	SSD_HM_0098 60	Stipulated	Disputed	FRE 401; 403; 801
588.	October 4, 2018 email from J.Maughan to T.Stratton re: [no subject] with list of various elementary and	SSD_HM_0057 79- SSD_HM_0057 80	Disputed	Disputed	FRE 401; 403; 801; 901

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589.	frustrations with HM January 29, 2019				
589.	January 29, 2019				
	email from	SSD_HM_0057 56	Stipulated	Disputed	FRE 401;
	H.McAndie to S.Jefferson,				403; 801
	K.Bushy, J.Maughan,				
	R.Stanton and				
	today				
590.	February 26, 2019 email from	SSD_HM_0057 55	Stipulated	Disputed	FRE 401;
	T.Stratton to				403; 801
	J.Maughan,				
	J.Lopez, D.Hudson re:				
	truant student at				
	T.Stratton				
	serving parents				
	no truancy				
591.	May 16, 2019	SSD_HM_0056	Stipulated	Disputed	FRE
		30			401; 403; 801
	S.Jefferson,				
	R.Stanton,				
502	for [redacted]	CCD HM 0056	Dianutad	Disputed	FRE
392.	H.McAndie	13-	Disputed	Disputed	401;
	email to L.Forshaw re:	SSD_HM_0056 14			403; 801; 901
	ENTERING				
593.	September 13,	SSD_HM_0055	Stipulated	Disputed	FRE
	2019 T.Stratton email to	[31]			401; 403; 801
	H.McAndie J.Maughan.				
	592.	R.Stanton and G.Neal re: Court today 590. February 26, 2019 email from T.Stratton to H.McAndie, J.Maughan, J.Lopez, D.Hudson re: truant student at GWE T.Stratton difficulty serving parents and student with 23 absences and no truancy action 591. May 16, 2019 email from H.McAndie to S.Jefferson, K.Bushy, R.Stanton, J.Maughan re: Court hearing for [redacted] 592. June 11, 2019 H.McAndie email to L.Forshaw re: ENTERING TRUANCY 593. September 13, 2019 T.Stratton email to	R.Stanton and G.Neal re: Court today 590. February 26, 2019 email from T.Stratton to H.McAndie, J.Maughan, J.Lopez, D.Hudson re: truant student at GWE T.Stratton difficulty serving parents and student with 23 absences and no truancy action 591. May 16, 2019 email from H.McAndie to S.Jefferson, K.Bushy, R.Stanton, J.Maughan re: Court hearing for [redacted] 592. June 11, 2019 H.McAndie email to L.Forshaw re: ENTERING TRUANCY 593. September 13, 2019 T.Stratton email to H.McAndie	R.Stanton and G.Neal re: Court today 590. February 26, 2019 email from T.Stratton to H.McAndie, J.Maughan, J.Lopez, D.Hudson re: truant student at GWE T.Stratton difficulty serving parents and student with 23 absences and no truancy action 591. May 16, 2019 email from H.McAndie to S.Jefferson, K.Bushy, R.Stanton, J.Maughan re: Court hearing for [redacted] 592. June 11, 2019 H.McAndie email to L.Forshaw re: ENTERING TRUANCY 593. September 13, 2019 T.Stratton email to H.McAndie	R.Stanton and G.Neal re: Court today 590. February 26, 2019 email from T.Stratton to H.McAndie, J.Maughan, J.Lopez, D.Hudson re: truant student at GWE T.Stratton difficulty serving parents and student with 23 absences and no truancy action 591. May 16, 2019 email from H.McAndie to S.Jefferson, K.Bushy, R.Stanton, J.Maughan re: Court hearing for [redacted] 592. June 11, 2019 H.McAndie email to L.Forshaw re: ENTERING TRUANCY 593. September 13, 2019 T.Stratton email to H.McAndie 6

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	R.Clark,				
	D.Hudson				
	re:letter template				
	for absences				
594.	September 18,	SSD_HM_0055	Stipulated	Disputed	FRE
	2019	18			401;
	H.McAndie				403; 801
	email to				
	T.Stratton,				
	J.Lopez,				
	J.Maughan,				
	M.Willis re:				
	question about				
	attendance sheet				
505	for parents	00D IB4 0055	G.: 1 · 1	D: 1	EDE
595.	September 28,	SSD_HM_0055	Stipulated	Disputed	FRE
	2019	12			401;
	H.McAndie email to				403; 801
	T.Norman,				
	J.Maughan,				
	T.Stratton re:				
	new attendance				
596.		SSD_HM_0054	Stipulated	Disputed	FRE
370.	2019	76-	Supulated	Disputed	401;
	H.McAndie	SSD_HM_0054			403; 801
	email to	78			100,001
	C.Harms and				
	K.Queen re:				
	student with				
	major attendance				
	concerns		<u> </u>		
597.	January 10, 2020	SSD_HM_0054	Stipulated	Disputed	FRE
	H.McAndie	46-			401;
	email to	SSD_HM_0054			403; 801
	L.Forshaw, M.	47			
	Harris, and				
	J.Maughan re:				
	case files		1		
598.	October 7, 2020	SSD_HM_0050	Stipulated	Disputed	FRE
	H.McAndie	70			401;
	email to				403; 801
	K.Queen,				
	J.Maughan,				
	L.Lestage re:				
	check in attendance				
	CALLED A LATACO	i contract to the contract to	i .	1	•

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599.	June 25, 2019	SSD_HM_0056	Stipulated	Disputed	FRE
	H.McAndie	09-		1	401;
	email to	SSD_HM_0056			403; 801
	J.Maughan,	12			
	G.Neal,				
	D.Apeland re:				
	placement for				
	next year				
500.		SSD_HM_0053	Stipulated	Disputed	FRE
	H.McAndie	14			401;
	email to				403; 801
	J.Maughan re:				
	Student				
101	teaching	CCD IIM 0074	C4:1-4 1	Diamet 1	EDE
501.	January 8, 2020 H.McAndie	SSD_HM_0054 49-	Stipulated	Disputed	FRE
	email to	SSD_HM_0054			401; 403; 801
	J.Maughan re:	55D_11W1_0034			403, 801
	Work hours				
502.	April 17, 2020	SSD_HM_0053	Stipulated	Disputed	FRE
	V.Balint email	80	Zaparaca	2 ispated	401;
	to H.McAndie				403; 801
	re: Check In				
	Meeting				
03.	May 18, 2020	SSD_HM_0082	Stipulated	Disputed	FRE
	H.McAndie	76-			401;
	email to	SSD_HM_0082			403; 801
	J.Maughan re:	77			
	5/11-5/15 Check				
-0.4	In	222 222 20100			
504.	May 26, 2020	SSD_HM_0100	Stipulated	Disputed	FRE
	H.McAndie	67-			401;
	email to J.Maughan re:	SSD_HM_0100 68			403; 801
	5/18-5/22 Check	00			
	In				
505.	June 1, 2020	SSD_HM_0052	Stipulated	Disputed	FRE
	H.McAndie	89-	Zaparaca	2 ispated	401;
	email to	SSD_HM_0052			403; 801
	J.Maughan re:	92			-,
	5/25-5/29 Check				
	in		<u> </u>		
506.	June 8, 2020	SSD_HM_0052	Disputed	Disputed	FRE
	H.McAndie	77-			106;
	email to	SSD_HM_0052			401;
	J.Maughan re:	78			403;
					801; 901

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1		6/1-6/5 Check In				
2	607.	June 12, 2020 H.McAndie	SSD_HM_0100 60	Stipulated	Disputed	FRE 401;
3		email to J.Maughan re:				403; 801
4 5		6/8-6/12 Check In				
5	608.	June 22, 2020 H.McAndie	SSD_HM_0100 58	Stipulated	Disputed	FRE 401;
7		email to J.Maughan re:				403; 801
3	600	Check in 6/15-6/19	CCD HM 0100	Ctimulate d	Diameted	FRE
)	609.	June 29, 2020 H.McAndie email to	SSD_HM_0100 55- SSD_HM_0100	Stipulated	Disputed	401; 403; 801
1		J.Maughan re: Check in 6/22-	56			403, 801
2	610.	6/26 July 6, 2020	SSD_HM_0334	Stipulated	Disputed	FRE
3	010.	H.McAndie email to	0	Stipulated	Disputed	401; 403; 801
1		J.Maughan re: Check In 6/29-				
5	611.	7/3 July 20, 2020	SSD_HM_0051	Stipulated	Disputed	FRE
,	011.	J.Maughan email to H.McAndie	68 SSD_HM	Supulated	Disputed	401; 403; 801
;		re: 7/13-7/16 Check In	00169			
	612.	July 23, 2020 H.McAndie	SSD_HM_0100 47	Stipulated	Disputed	FRE 401;
		email to J.Maughan				403; 801
		re: 7/20-7/23 Check in				
	613.	July 30, 2020 H.McAndie	SSD_HM_0100 46	Stipulated	Disputed	FRE 401;
		email to J.Maughan re: 7/27-7/30 check				403; 801
	<i>c</i> 1 1	in	aab voice	G.: 1	D :	
	614.	August 7, 2020 H.McAndie email to	SSD_HM_0100 41	Stipulated	Disputed	FRE 401; 403; 801
		J.Maughan re:				, -

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1		8/3-8/7 Check In					
2	615.	August 14, 2020 McAndie email	SSD_HM_0100 31	Stipulated	Disputed	FRE 401;	
3		to J.Maughan re 8/14-8/14 check				403; 801	
4	(1)	in	GGD IIM 0100	G.: 1 . 1	D' 4 1	EDE	
5	616.	August 21, 2020 H.McAndie to	SSD_HM_0100 24	Stipulated	Disputed	FRE 401;	
6		J.Maughan email re: check in				403; 801	
7	617	8/17-8/21	CCD LIM 0100	Ctimulatad	Diamutad	FRE	
8	617.	H.McAndie	SSD_HM_0100 23	Stipulated	Disputed	401;	
9		email to J.Maughan re:				403; 801	
10		Check In 8/24- 8/28					
11	618.	September 4, 2020	SSD_HM_0100 22	Stipulated	Disputed	FRE 401;	
12		H.McAndie	22			403; 801	
13		email to J.Maughan re:					
14		Check In 8/31- 9/4					
15	619.	September 11, 2020	SSD_HM_0100 21	Stipulated	Disputed	FRE 401;	
16		H.McAndie	21			403; 801	
17		email to J.Maughan re:					
18		Check In 9/7- 9/11					
19	620.	September 18, 2020	SSD_HM_0100 20	Stipulated	Disputed	FRE 401;	
20		H.McAndie	20			403; 801	
21		email to J.Maughan re:					
22		Check In 9/14- 9/18					
23	621.	September 25,	SSD_HM_0073	Stipulated	Disputed	FRE	
24		2020 H.McAndie	76			401; 403; 801	
25		email to J.Maughan re:					
26		Check In 9/21-					
27		9/25					

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1	622.	October 12, 2020	SSD_HM_0100 00	Stipulated	Disputed	FRE 401;
2		H.McAndie				403; 801
3		email to J.Maughan re:				
4		Check in 10/5 to 10/9				
5	623.	October 18,	SSD_HM_0099	Stipulated	Disputed	FRE
6		2020 H.McAndie	77			401; 403; 801
7		email to J.Maughan re:				
		Check in 10/2 to				
8	624.	10/16 Interim	SSD_HM_0101	Disputed	Disputed	FRE
9		Superintendent Feedback	80- SSD_HM_0102			106; 401;
10		Survey Results	02			403;
11						404; 801; 901
12	625.	October 12, 2020	SSD_HM_0050 41-	Stipulated	Stipulated	
13		H.McAndie	SSD_HM_0050			
14		email to V. Balint re:	42			
15		Complaint of Sexual				
16		Harassment	GGD 1711 0050		5.	555
17	626.	February 7, 2021 H.McAndie	SSD_HM_0050 20	Stipulated	Disputed	FRE 106;
18		email to J.Maughan re:				401; 403; 801
19		Leave of				
20		Absence Request				
21	627.	Hanna and Ian McAndie	SSD_HM_0103 21-	Stipulated	Disputed	FRE 401; 403
22		Divorce	SSD_HM_0103			
23	628.	Declarations May 1, 2019	49 SSD_HM_0056	Disputed	Disputed	FRE
24		H.McAndie email to C.Smith	72			106; 401;
25		re: School Board FYI				403; 801; 901
26		("I'm in Spain right now")				
27		µigii ilow)	I			

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1	629.	July 29, 2020 H.McAndie	SSD_HM_0051 66-	Stipulated	Disputed	FRE 401;
2		email to	SSD_HM_0051			403; 801
3		M.Mello re: URGENT! Time	67			
4		Sensitive: Sequim School				
5		District 323 - Need				
6		information by				
7	630.	EOB tomorrow July 9, 2020	SSD_HM_0051	Stipulated	Disputed	FRE
8		M.Lyke to J.Maughan,	82- SSD_HM_0051			401; 403; 801
9		H.McAndie,	85 85			103, 001
10		R.Alcafaras, M.Seabolt,				
11		T.Norman re: P- EBT Posts				
12	631.	July 7, 2020	SSD_HM_0052	Disputed	Disputed	FRE
13		M.Lyke to T.Norman re:	32			106; 401;
14		FW: SSD Youtube				403; 801; 901
15	632.	July 8, 2020 J.Maughan to	SSD_HM_0052 39	Disputed	Disputed	FRE 106;
16		H.McAndie,	37			401;
17		M.Lyke, T.Norman re:				403; 801; 901
18	633.	PIO Information EEOC	SSD_HM_0119	Stipulated	Stipulated	
	033.	Complaint	0-	Supulated	Supulated	
19			SSD_HM_0128 4			
20	634.	EEOC Determination	SSD_HM_0113 8-	Stipulated	Disputed	FRE 401; 403
21		Betermination	SSD_HM_0113			101, 103
22	635.	Hanna Smith	9	Stipulated	Disputed	FRE
23		McAndie Voluntary				401; 403; 801
24		Statement				,
25		Pueblo County Sheriff's Office				
26		November 2, 2011				
27	<u> </u>	<u> </u>	1	ı	l	

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636.	Affidavit in		Stipulated	Disputed	FRE
	Support of				401;
	Warrantless				403; 801
	Arrest				
	November 2, 2011				
637.	Pueblo County		Stipulated	Disputed	FRE
	Sheriff's Office				401;
	Deputy Report for Incident				403; 801
	11U1939				
638.	Dr. Brown	5227-001894-	Stipulated	Disputed	FRE
	Report	5227-001897			401;
					403; 801
639.	Dr. Brown	No Bates	Stipulated	Disputed	FRE
	Addendum				401;
640	Du Annia anti-	No Dotos	C4:1-4-1	Diament - 1	403; 801
640.	Dr. Applegate report	No Bates	Stipulated	Disputed	FRE 401;
	report				403; 801
541.	Dr. Brown		Stipulated	Stipulated	100,001
	Declaration in		1	1	
	support of				
	Motions for				
	Sanctions and				
	attachments thereto				
542.	Dr. Brown CV		Stipulated	Disputed	FRE
012.	Di. Biown C v		Supulated	Disputed	401;
					403; 801
543.	Dr. Brown list of		Stipulated	Disputed	FRE
	cases				401;
C 1 1	D 4 1			D:	403; 801
644.	Dr. Applegate		Stipulated	Disputed	FRE
	CV				401; 403; 801
645.	Timeline		Not	Not	Not
o 15.	(Illustrative)		provided	provided	provided
			Dispute	Dispute	Plaintiff
				•	reserves
					objection
					after
		i .			review
<u> </u>	C-11-		NI-4	NT - 4	NT - 4
646.	Calendar		Not Provided	Not	Not
646.	Calendar (Illustrative)		Not Provided	Not provided	Not provided Plaintiff

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1					objection after
2	647.	Jennifer	Not	Not	review Not
3	047.	Maughan	provided	provided	provided
3		Deposition	Postoria	F	Plaintiff
4		Video Footage			objects
5					to any
3					use of
6					footage as no
7					depositio
					n
8					designati
9					ons were
					made by Defenda
10					nts
11	648.	Ian McAndie	Not	Not	Not
		Deposition	provided	provided	provided
12		Video Footage			Plaintiff
13					objects
					to any use of
14					footage
15					as no
					depositio
16					n
17					designati
					ons were
18					made by Defenda
19					nts
	649.	Hanna McAndie	Not	Not	Not
20		Deposition	provided	provided	provided
21		Video Footage			Plaintiff
22					objects to any
22					use of
23					footage
24					as no
24					depositio
25					n dasismati
26					designati ons were
26					made by
27			1	1	, × J

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					Defenda nts
650.	Psychotherapy Intake Note CONFIDENTI AL	5227:001497	Stipulated	Disputed	FRE 401; 403; 801
651.	July 22, 2020 Psychotherapy Progress Note CONFIDENTI AL	5227:001536	Stipulated	Disputed	FRE 401; 403; 801
652.	July 20, 2020 Psychotherapy Progress Note CONFIDENTI AL	5227:001534	Stipulated	Disputed	FRE 401; 403; 801
653.	July 29, 2020 Psychotherapy Progress Note CONFIDENTI AL	5227:001538	Stipulated	Disputed	FRE 401; 403; 801
654.	January 27, 2022 Parkland CRC Episode 1 CONFIDENTI AL	5227 - 001627	Stipulated	Disputed	FRE 401; 403; 801
655.	January 27, 2022 Parkland CRC Episode 1 CONFIDENTI AL	5227 – 001628	Stipulated	Disputed	FRE 401; 403; 801
656.	January 27, 2022 Parkland CRC Episode 1 CONFIDENTI AL	51227 – 001631	Stipulated	Disputed	FRE 401; 403; 801
657.	(no date) South Sound Behavioral Hospital Physician Discharge Summary CONFIDENTI	5227-001679	Stipulated	Disputed	FRE 401; 403; 801

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Constitute	
Behavioral Hospital Psychiatric Note CONFIDENTI AL	
Psychiatric Note CONFIDENTI AL	
CONFIDENTI AL	
659. March 21, 2022 5227-001706 Stipulated Disputed FRE 401; 403; 801	
South Sound Behavior Hospital Psychiatric Note CONFIDENTI AL	
Hospital	
Psychiatric Note CONFIDENTI AL	
660. March 20, 2022 5227-001709 Stipulated Disputed FRE 401; 403; 801	
South Sound Behavioral Hospital Psychiatric Note CONFIDENTI AL	
Behavioral Hospital Psychiatric Note CONFIDENTI AL	
Psychiatric Note CONFIDENTI AL	
AL	
South Sound Hospital Nursing Assessment CONFIDENTI AL	
Hospital Nursing Assessment CONFIDENTI AL	
Assessment CONFIDENTI AL 662. March 17, 2022 5227-001742 Stipulated Disputed FRE Psychosocial Assessment CONFIDENTI AL 663. (no date) South Sound Discharge The projections of the confidence	
17 662. March 17, 2022 5227-001742 Stipulated Disputed FRE 401; 403; 801	
Psychosocial Assessment CONFIDENTI AL 663. (no date) South Sound Discharge	
Assessment CONFIDENTI AL 663. (no date) South Sound Discharge The profition of the profit of the p	
19 AL 663. (no date) South Sound Discharge Stipulated Disputed FRE 401;	
Sound Discharge 401;	
102. 901	
Plan	
22 CONFIDENTI	
23 AL Stipulated Disputed FRE	
South Sound 5227 001800 Supulated Disputed 101:	
Behavioral 403; 801	
25 Hospital Discharge	
26 Medication	
27 Summary for Patient	

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	CONFIDENTI				
665.	AL April 6, 2022 South Sound Behavioral Hospital Psychiatric Evaluation CONFIDENTI	5227-001810	Stipulated	Disputed	FRE 401; 403; 801
	AL				
666.	(no date) South Sound Behavioral Hospital Psychiatric Evaluation CONFIDENTI AL	5227-001812	Stipulated	Disputed	FRE 401; 403; 801
667.	April 6, 2022 South Sound Behavioral Hospital CONFIDENTI AL	5227-001837- 5227-001843	Stipulated	Disputed	FRE 401; 403; 801
568.	October 9, 2020 Text exchange between Plaintiff and G. Neal	НЈМ0003	Stipulated	Stipulated	
669.	December 22, 2020 Text exchange between Plaintiff and G.Neal	НЈМ0006	Stipulated	Disputed	FRE 401; 403; 801
670.	January 21, 2021 Text exchange between Plaintiff and G. Neal	НЈМ0007- НЈМ0012	Stipulated	Disputed	FRE 106; 401; 403; 801
671.	February 3, 2021 Email exchange between Plaintiff and J.Maughan	НЈМ0014- НЈМ0058	Disputed	Disputed	FRE 106; 401; 403; 801; 901
672.	Text exchange between Plaintiff and M.Lyke re working from home	НЈМ0074	Stipulated	Disputed	FRE 106; 401; 403; 801; 901

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1	673.	September 22, 2020 Completed	SSD_HM_0000 17	Stipulated	Stipulated		
2		Employee Data Sheet					
3		recommending H.McAndie as					
4		Student Support Specialist					
5	674.	November 20, 2019	SSD_HM_0000 18	Stipulated	Stipulated		
7		H.McAndie completed					
8		Student Support Specialist form					
9	675.	Klosterman Investigation	SSD_HM_0204 2-	Disputed	Disputed	FRE 106; 901	
10		Notes from Jennifer	SSD_HM_0204 3				
11 12 13	676.	Maughan Plaintiff's Complete Tort Claim	HJM-000001- HJM-000091	Stipulated	Disputed	FRE 403 (duplicat e of prior	
14	677.	Interview Notes,	(Clark responses	Stipulated	Disputed	exhibit) FRE	
15 16	077.	Charge: 551- 2021-00087, Intake:	RFP 2)	Supulated	Disputed	401; 403	
17		December 9, 2020 @8:30am – 9:35am					
18	678.	October 27 and	CCD 1IM 0202	NI-4	NT-4	D.f 1.	
19	078.	28 email	SSD_HM_0282 9 -	Not provided	Not provided	Defenda nts did	
20		exchanges between	SSD_HM_0283 0	Disputed	Disputed	not produce	
21		H.McAndie and A. Klosterman				this exhibit.	
22		re: Sequim S.D. Investigation				Plaintiff reserves	
23		mvosugadon				objection	
24						to the documen	
25						t after review	
26	1	1	1	<u>. l</u>		1	

Plaintiff reserves the right to offer at trial any exhibit listed by Defendant above.

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Record Custodians In the event authentication is contested at time of trial, the parties reserve the right to call any and all record custodians for authentication of records. The parties reserve the right to add to the final pretrial order any witnesses identified in discovery, initial disclosures, or in depositions, or as necessary to address objections to authenticity or admissibility of evidence by the defense. This order has been approved by the parties as evidenced by the signatures of their counsel. This order shall control the subsequent course of the action unless modified by a subsequent order. This order shall not be amended except by order of the court pursuant to agreement of the parties or to prevent manifest injustice. DATED this 14th day of March, 2023. Honorable John H. Chun United States District Court Judge

1	FORM APPROVED	
2	Dry /a/ David Callach on	
3	By: <u>/s/ Daniel Gallagher</u> Daniel C. Gallagher, WSBA No. 21940	
4	GALLAGHER LAW OFFICE PS 10611 Battle Point Drive NE	
5	Bainbridge Island, Washington 98110-1493	
	Email: dan@nwprolaw.com Phone: 206.855.9310	
6	Fax: 206.462.1557	
7		
8	By: <u>/s/ Rachel L. Anyan</u> Rachel L. Anyan, WSBA No. 55252	
9	Anyan Legal Services 4813 158 th Ave SE	
10	Bellevue, WA 98006	
11	Phone: 714.227.3205	
12	Attorneys for Plaintiff Hanna J. McAndie	
13		
14	By: /s/ Lori M. Bemis Lori M. Bemis, WSBA #32921	
15	McGAVICK GRAVES, P.S.	
16	1102 Broadway, Suite 500 Tacoma, WA 98402	
17	Phone: 253.627.1181	
18	Attorney for Defendant Clark	
19		
20		
21		
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	PRETRIAL ORDER - 54 No. 3:21-cv-05227-JHC	